



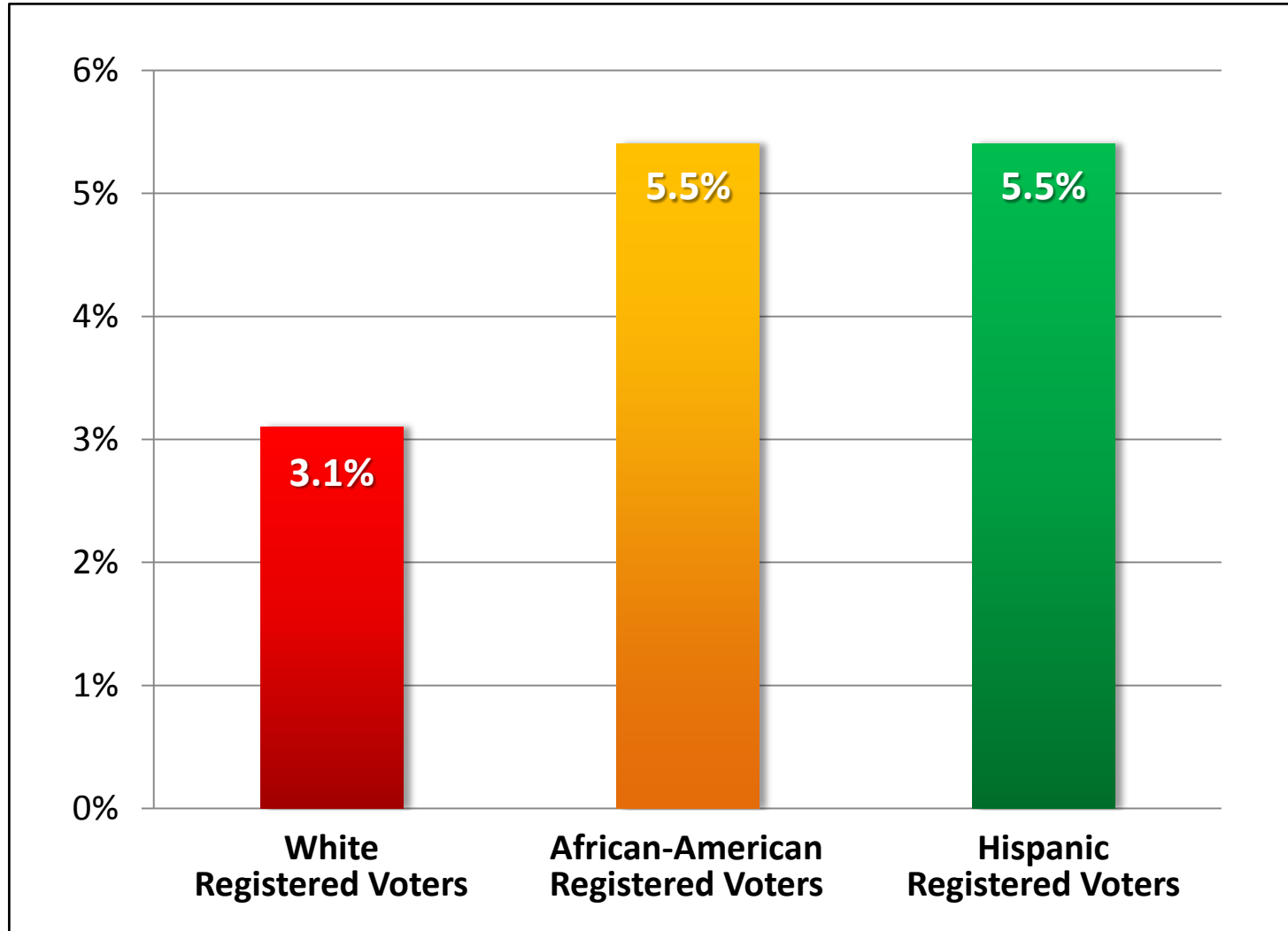
Coleman Bazelon, Ph.D.

Summary Of Conclusions

- A disproportionate share of registered voters who will need a new ID to continue to be able to vote under SB 14 are African American.
- Acquiring an ID for the purpose of voting, including a nominally free ID, comes with real economic costs.
- The burden of the costs imposed by SB 14 is substantially higher for African-American Texans, who are disproportionately poorer, than for white Texans.

Share Of Registered Voters Who Must Obtain SB 14 ID – By Race

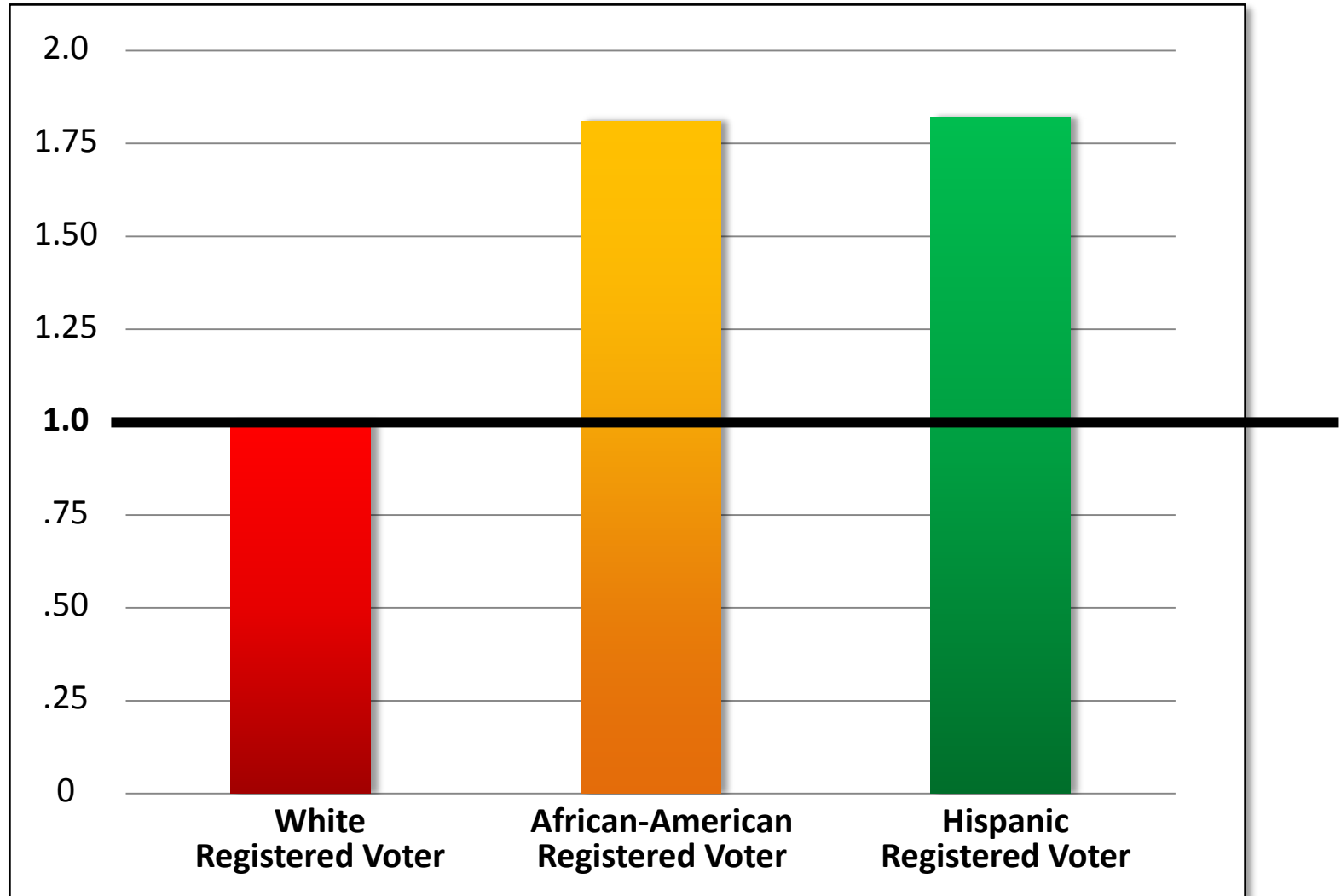
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Source: Third Amended Expert Report of Coleman Bazelon, Table 1

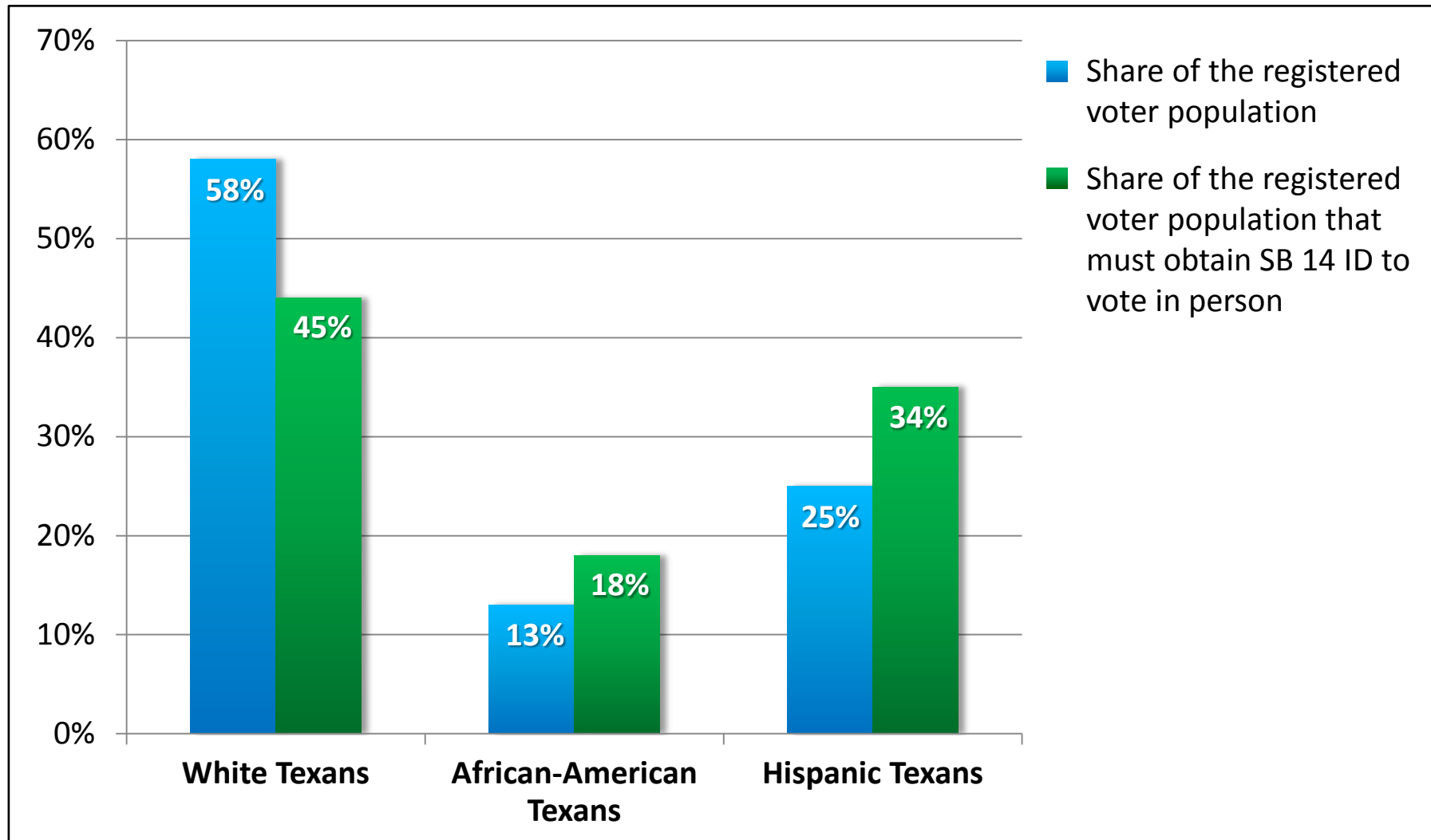
Odds Ratio Likelihood Of Needing To Obtain SB 14-Compliant ID In Order To Vote In Person

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Minorities Are Disproportionately Impacted By SB 14 ID Requirement

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Source: Calculation from Third Amended Expert Report of Coleman Bazelon, Table 1

Illustrative Example Of Travel Mode Choice And Cost Calculation

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Table 4: Illustrative Example of Travel Mode Choice and Cost Calculation

	Hypothetical Voter		
	African American Wage = \$13.03		
	DPS Location		
	1	2	3
Taxi			
Travel Time (minutes)	10	9	12
Value of Time (\$)	\$2.17	\$1.95	\$2.61
Fare (\$)	\$14.50	\$13.25	\$17.00
Total (\$)	\$16.67	\$15.20	\$19.61
Walk			
Travel Time (minutes)	150	135	180
Value of Time (\$)	\$32.58	\$29.32	\$39.09
Fare (\$)	\$0.00	\$0.00	\$0.00
Total (\$)	\$32.58	\$29.32	\$39.09
Public Transit			
Travel Time (minutes)	42	51	44
Value of Time (\$)	\$9.12	\$11.03	\$9.64
Fare (\$)	\$4.10	\$4.54	\$4.22
Total (\$)	\$13.22	\$15.57	\$13.86

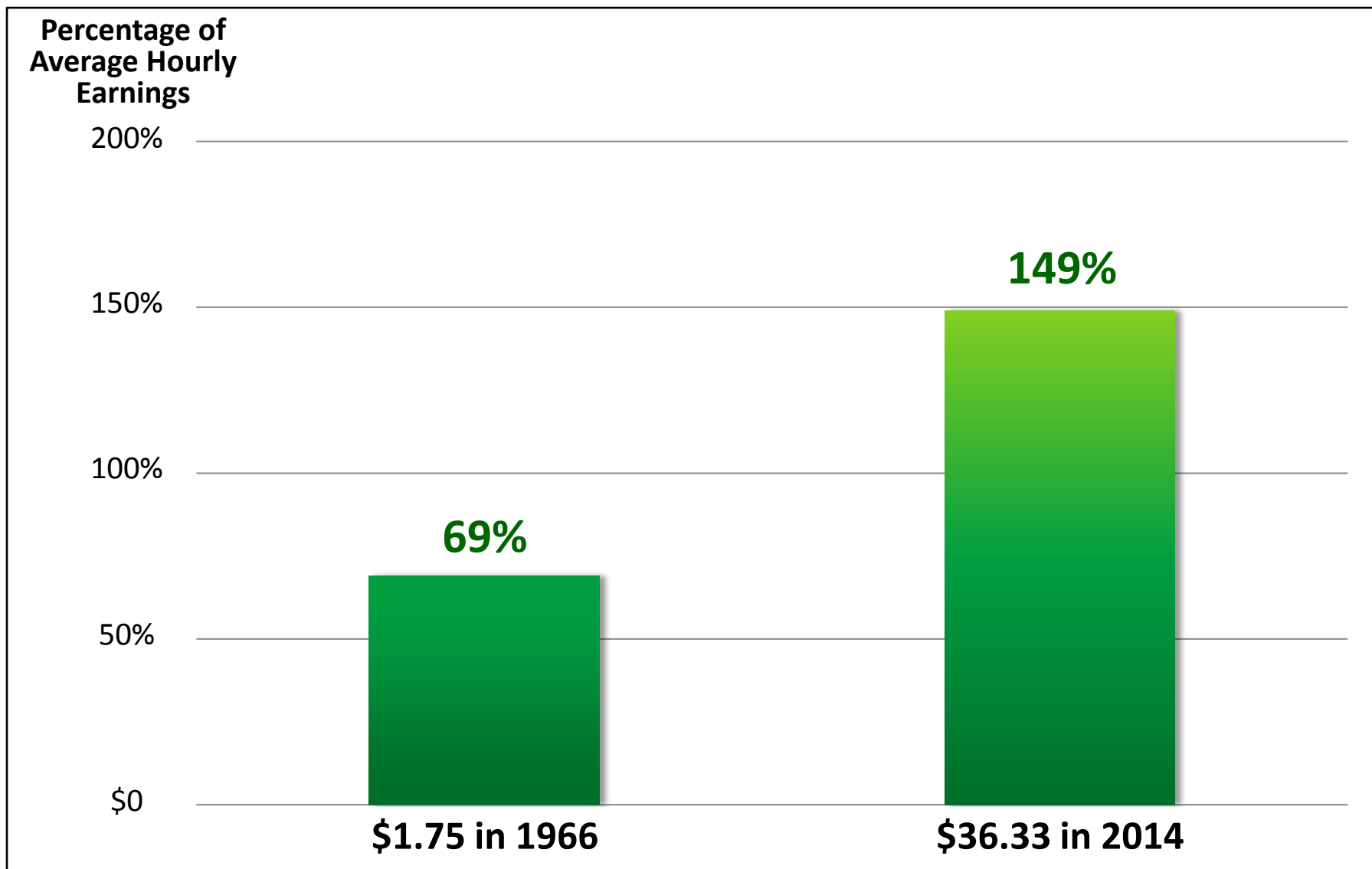
Costs To Obtain An EIC

Hypothetical African-American Registered Voter

- Travel Costs = **\$26.68**
- One hour spent at DPS = **\$13.03**
- One hour spent acquiring birth certificate = **\$13.03**
- Birth certificate fees (mail-in application) = **\$22**
- Partial day of child care services = **\$11**

Total Costs = \$85.74

SB 14 – Significance Of The Level Of Costs



African American Texans Have Lower Incomes Than White Texans

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Table 7: Texas Household Income by Race

State of Texas 2010	African American		White	
\$21,288 less than White Texans				
Median Household Income	[1]	\$ 31,104	\$	52,392
% Difference with White	[2]	68.4%		
Total Number of Households	[3]	263		1,087
Households below White Median	[4]	181		
Households below White Median (%)	[5]	68.8%		

African American Texans Have Lower Wealth Than White Texans

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Table 8: Texas Household Wealth by Race

State of Texas 2010	African American		White	
		\$85,839 less than White Texans		
Median Household Wealth	[1]	\$ 11,961	\$	97,800
% Difference with White	[2]	717.7%		
Total Number of Households	[3]	263		1,087
Households below White Median	[4]	217		
Households below White Median (%)	[5]	82.5%		

African-American Texans Are More Likely To Be Poor Than White Texans

Table 9: Texas Poverty Status by Race

	African American		White		% Difference Between White and African American
At or Above the Poverty Line	2,046,954	77%	10,061,576	91%	15%
Below the Poverty Line	627,862	23%	956,513	9%	-15%

Source: U.S. Census Bureau, 2006-2010 American Community Survey

African-American Texans Score Lower On Other Measures Of Socioeconomic Status Than White Texans

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Table 10: Texas Employment Status by Race

	African American		White	
Employed	1,186,242	88%	5,627,211	95%
Unemployed	158,430	12%	317,602	5%
% Difference Between White and African American Unemployment				

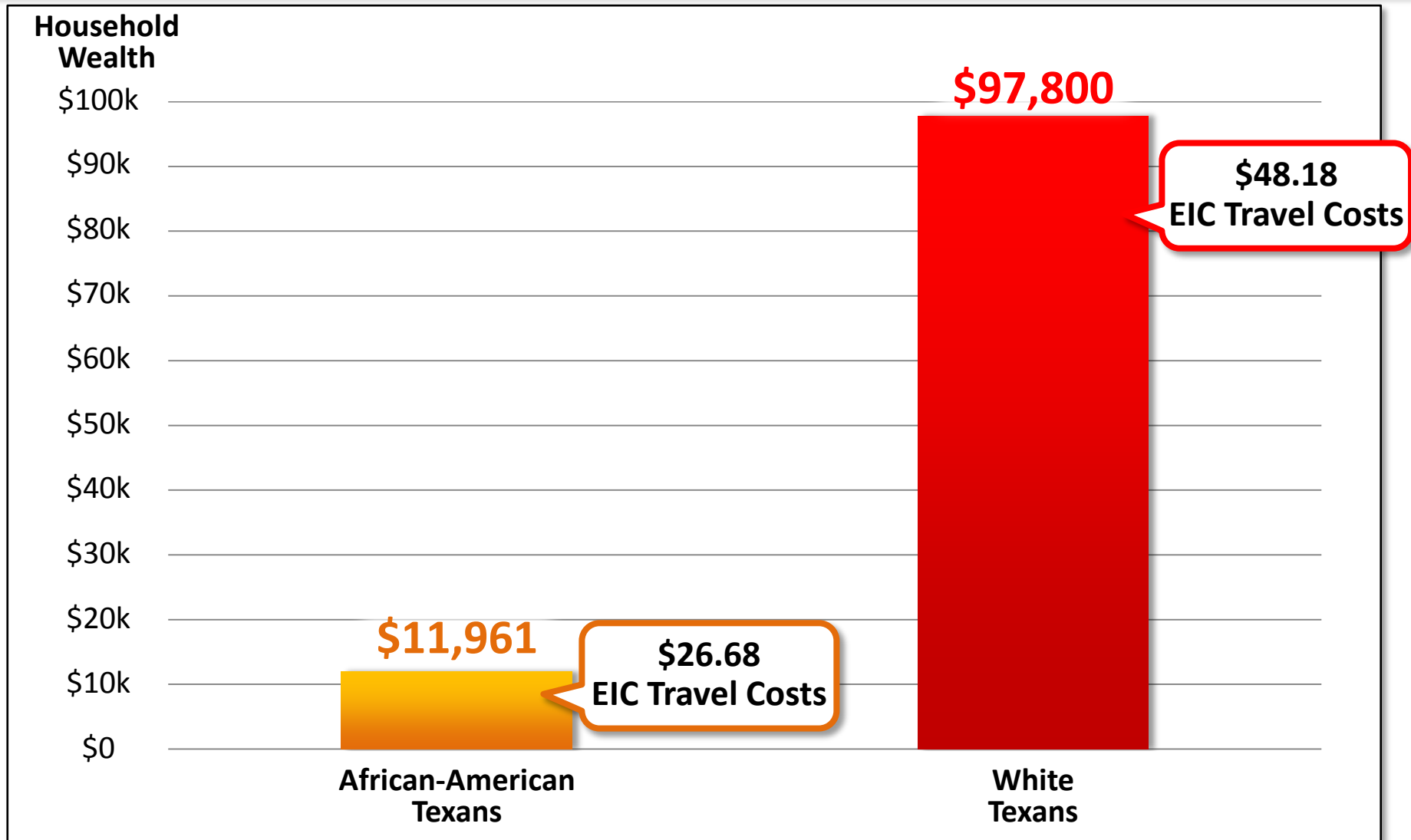
Source: U.S. Census Bureau, 2006-2010 American Community Survey

Table 11: Texas Education Attainment by Race

	No High School Diploma		No Undergraduate Degree	
African American	260,738	16%	977,674	58%
White	688,064	9%	4,011,559	51%
% Difference Between White and African American Educational Attainment		-7%	-8%	

Source: U.S. Census Bureau, 2006-2010 American Community Survey

African American Texans Are Required To Expend A Share Of Wealth That Is More Than Four Times Higher Than The Share Required For White Texans



<p>14</p> <p>1 A. So we have -- we require either through a 2 system required field, which means you can't save a 3 record without putting something into a field. The 4 computer won't let you. Or by policy we have certain 5 fields that we require sections in office to populate 6 for a matter and for a case. 7 Q. And what are the system required fields? 8 A. So I don't -- I will honestly tell you I don't 9 know them all, but like a case -- some -- a couple of 10 them I know for sure, like the case name, which for a 11 matter it would be the matter name. The section -- the 12 unit within the section, usually with the open date. So 13 those are a few. There's -- it's a handful. I just -- 14 I don't have it committed to memory. 15 Q. And is there a manual for the ACTS database as 16 to how it works? 17 A. There is, yes. 18 Q. And is that publicly available? 19 A. No. 20 Q. And are there any -- we had talked about -- you 21 talked about what specific types of information are 22 required to be inputted. What -- how does -- strike 23 that. 24 Who makes a determination as to whether or not 25 something that somebody has worked on needs to be</p>	<p>PL1160 9/2/2014 2:13-cv-000193</p> <p>16</p> <p>1 investigations that other entities are doing? 2 A. So the investigation would just meet the 3 threshold. So if you're spending more than 30 minutes, 4 whatever capacity you're spending on it, it's going to 5 be a matter. 6 Q. And I think you said a matter is defined as an 7 investigation. What's your understanding of what an 8 investigation is? 9 A. And so it would be -- it could -- it obviously 10 would be something -- some sort of wrongdoing in the 11 legal -- it's something that -- it's some inappropriate 12 behavior that the section would be looking at along with 13 generally an investigative agency. It's usually, you 14 know, a joint -- a joint effort. It does not have to -- 15 it does not have to -- at the -- when you put it into 16 ACTS, it does not have to lead to a case. So you don't 17 have to have the expectation that it will lead to a 18 case, I guess, is better. 19 Q. And what are the sources for the matters that 20 come in that are worked on by the attorneys? 21 A. Generally I'm not sure of all the sources, but 22 generally most of them are from an investigative agency. 23 Q. When you say investigative agency, would that 24 include the FBI? 25 A. Right.</p>
<p>15</p> <p>1 inputted into the ACTS system? 2 A. So we have a standard definition for a matter 3 and for a case. And so as long as whatever that is that 4 you're working on, either meets a matter's -- the 5 definition for a matter or definition for a case, that's 6 the threshold to be put into ACTS. 7 Q. And what's the standard definition of a matter? 8 A. So it's an investigation that takes -- that an 9 attorney spends 30 minutes or more on. 10 Q. And how about what's the definition of a case? 11 A. So anything that's been indicted, through an 12 indictment or information. 13 Q. And is that whether or not they spent 30 14 minutes or more? 15 A. Yeah, there's no time threshold, as long 16 as -- as long as they're an attorney on record. Either 17 they are an attorney on record -- we also do moderate -- 18 some sections do monitoring of cases, and so those would 19 go in if they have a monitoring responsibility. 20 Q. Okay. And so if there's a monitoring 21 responsibility, it would go in regardless of the time 22 limit? 23 A. Right, because it would be a case, a 24 monitored -- a case that you would be monitoring. 25 Q. Is there any monitoring -- monitoring of</p>	<p>17</p> <p>1 Q. Does that ever include a state investigator? 2 A. I don't know. I think so, but maybe I 3 shouldn't say I think so. 4 Q. And do you know whether that would include 5 local or county law enforcement? 6 A. Right. Yeah, I mean, obviously if it meets 7 the -- I think that if it met the federal criteria for 8 our involvement in a case, then it would be -- it could 9 be referred from, you know, from any point. 10 Q. And who determines that it's for investigations 11 or for matters that it's -- strike that. 12 Is it written anywhere that it's a 30-minute -- 13 if you've worked on a matter for more than 30 minutes, 14 it needs to go into ACTS? 15 A. So it's set by policy in our manual. 16 Q. Okay. And is there any discretion as to how 17 that policy is implemented among the various branches or 18 divisions of the Criminal Division? 19 A. So sections offices? 20 Q. Yes. Sorry. 21 A. No, it's fine. We set the definition, which is 22 a broad definition, and so the discretion is left up to 23 the management of the section or office. But it is in 24 policy what the definition is, and they're -- they are 25 asked to comply with it.</p>

<p style="text-align: right;">14</p> <p>1 Q. And how did that role change when you became an 2 assistant director?</p> <p>3 A. Tell people to extract data and create reports.</p> <p>4 Q. And I think you had said that you get 5 approximately 4 to 5,000 requests annually?</p> <p>6 A. To clarify, 4,000 to 5,000 requests annually, 7 yes.</p> <p>8 Q. And typically who do those requests come from?</p> <p>9 A. They come from EOUSA leadership, they come from 10 other components within the Department of Justice. We 11 receive requests from Congress, from various committees 12 and private offices on the Hill. We receive requests 13 from GAO. And then we also receive requests from the 14 White House. Typically those requests come from the 15 Office of Management and Budget.</p> <p>16 Q. Do you ever receive FOIA, Freedom of 17 Information Act requests?</p> <p>18 A. We do, not frequently. You know, fewer than a 19 dozen a year.</p> <p>20 Q. And when you receive a FOIA request, are there 21 any limitations on what data you can share with a member 22 of the public as opposed to the White House or the GAO?</p> <p>23 A. Yes.</p> <p>24 Q. And what generally are those limitations?</p> <p>25 A. There's a redaction policy established by our</p>	<p style="text-align: right;">16</p> <p>1 if there are portions that need to be discussed at 2 trial, but for the moment, we declare the whole 3 deposition as highly confidential under the protective 4 order.</p> <p>5 MS. WOLF: That's fine. 6 (Exhibit No. 4 was marked.)</p> <p>7 Q. (By Ms. Wolf) I've handed you a document 8 marked as Exhibit 4. Is this a printout from the LIONS 9 database?</p> <p>10 A. Yes, it is.</p> <p>11 Q. Okay. And so the fields of information that 12 are contained at the top of this document, are those all 13 of the fields that are contained in the LIONS database? 14 Or are there additional fields beyond those listed in 15 that first line?</p> <p>16 A. There are additional fields beyond what is 17 listed on this report.</p> <p>18 Q. And what are those additional fields, if you 19 know?</p> <p>20 A. There are a large number of them, so I couldn't 21 even begin to talk through them all.</p> <p>22 Q. Okay. And who is responsible for inputting the 23 data that's on Exhibit 4 into the LIONS database?</p> <p>24 A. The data is input at the district level, so 25 each district inputs the data. It varies from district</p>
<p style="text-align: right;">15</p> <p>1 FOIA staff. I suppose they can speak to this more 2 better than I could. Typically my staff will send a 3 report to the FOIA staff and then the FOIA staff would 4 be responsible for redacting what data they deem not 5 appropriate for public consumption.</p> <p>6 Q. To your knowledge, have you ever received a 7 request from a state government or a state governmental 8 entity for data from the LIONS database?</p> <p>9 A. I can't recall one way or the other.</p> <p>10 Q. Okay. And I want to talk to you a little bit 11 about the Information Act contained, but I think I'll 12 mark as an exhibit a document so you'll have a little 13 bit of framework to go on.</p> <p>14 A. Thank you.</p> <p>15 MS. WOLF: I'm going to mark as Exhibit 4 16 a document which is Bates numbered USA 223452 through 17 USA 223459. I would note for the record that this 18 document has been designated as highly confidential by 19 the United States. So while we're talking about this 20 document, we may want to designate -- we'll designate 21 this portion of the transcript as highly confidential.</p> <p>22 MR. HEARD: This is probably a good point 23 for me to put in we, I guess as a protective matter, 24 declare this whole deposition as highly confidential 25 under the protective order. I mean, we can talk later</p>	<p style="text-align: right;">17</p> <p>1 to district the procedures. I'll go on the record and 2 say it's rarely an attorney that enters it. It's 3 typically a legal assistant employed by the U.S. 4 Attorneys' office. Some districts use contractors and 5 some districts have a person whose job is referred to as 6 a docketing clerk, and they enter the data into the 7 system.</p> <p>8 Q. And what is -- what causes a matter or an issue 9 to be entered into the system?</p> <p>10 A. The general rule of thumb is if the attorney 11 spends an hour or more, then it should be -- then a 12 record should be opened in LIONS.</p> <p>13 Q. And is there any -- I think you had mentioned 14 that there is an attorney time database as well, 15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. Is there any coordination between the two 18 databases? For example, such that if something in the 19 time database takes more than an hour it's automatically 20 entered into the --</p> <p>21 A. No.</p> <p>22 Q. -- LIONS database?</p> <p>23 A. No.</p> <p>24 Q. So it has to be, for lack of a better word, a 25 manual determination by the attorney or his or her legal</p>

<p>18</p> <p>1 staff to enter the data into the LIONS database?</p> <p>2 A. I would agree with what you just said.</p> <p>3 Q. And I think you had said that there's a -- it's</p> <p>4 a general rule that if an attorney spends an hour or</p> <p>5 more it's entered into the LIONS database. Is there any</p> <p>6 written guideline or other rule or directive issued by</p> <p>7 the Executive Office of the U.S. Attorneys which</p> <p>8 mandates that the matter be entered after that amount of</p> <p>9 work?</p> <p>10 A. Yes, I believe there was a policy memo</p> <p>11 providing clarification on data entry and recording of</p> <p>12 time that was sent to all U.S. Attorneys in November, I</p> <p>13 think, 2009.</p> <p>14 Q. And prior to November 2009, in that policy</p> <p>15 memo, was the -- was the unspoken rule still that if an</p> <p>16 attorney worked on it for more than an hour it would go</p> <p>17 in? Or was there a different rule?</p> <p>18 A. Yes, that's correct.</p> <p>19 Q. And since you started at the Executive Office</p> <p>20 of the U.S. Attorneys, which I believe you said was in</p> <p>21 2003, has that rule been in place consistently?</p> <p>22 A. Yes.</p> <p>23 Q. To your knowledge, would an attorney or his</p> <p>24 legal -- his or her legal assistants ever enter a matter</p> <p>25 into the system that they hadn't worked more than an</p>	<p>20</p> <p>1 A. The U.S. Attorney himself or herself actually</p> <p>2 signs off on the final document.</p> <p>3 Q. And taking a look again at Exhibit 4, if you</p> <p>4 look at the top of this page, it says, "detailed records</p> <p>5 of cases and matters filed, pending closed, program</p> <p>6 categories 085." Do you know what the 085 is referring</p> <p>7 to?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And what is that?</p> <p>10 A. 085 is the program code for election fraud.</p> <p>11 Q. And do you have a general understanding of what</p> <p>12 election fraud for purposes of the LIONS database means?</p> <p>13 A. Yes.</p> <p>14 Q. And what's that understanding?</p> <p>15 A. Generally any case that involves some form of</p> <p>16 election or voting fraud.</p> <p>17 Q. And what's your understanding of what voting</p> <p>18 fraud is?</p> <p>19 A. I have my own personal belief, but I don't -- I</p> <p>20 can't speak to what --</p> <p>21 MR. HEARD: That prompts me to say</p> <p>22 objection, foundation.</p> <p>23 Q. (By Ms. Wolf) And I'm not asking for your</p> <p>24 personal belief, only if you have an institutional</p> <p>25 understanding.</p>
<p>19</p> <p>1 hour on?</p> <p>2 A. I'm sorry, I'm just a little slow. Can you --</p> <p>3 Q. No worries, I'm happy to rephrase it. It was</p> <p>4 confusing.</p> <p>5 Okay. So you said the general rule is that if</p> <p>6 an attorney spends an hour or more, they would enter the</p> <p>7 data into the database?</p> <p>8 A. Yes.</p> <p>9 Q. To your knowledge, are there matters contained</p> <p>10 in the database that an attorney had worked on for less</p> <p>11 than an hour that was entered into the system anyway?</p> <p>12 A. It is certainly possible.</p> <p>13 Q. You don't know either way?</p> <p>14 A. Right. That's correct.</p> <p>15 Q. And are there any checks in the system to</p> <p>16 ensure that matters that attorneys work on for more than</p> <p>17 an hour are entered into the LIONS database?</p> <p>18 A. U.S. Attorneys' offices are required to certify</p> <p>19 their caseload twice a year.</p> <p>20 Q. And when you say "their caseload," does that</p> <p>21 include investigations that may have been open where</p> <p>22 there's not an actual docket number?</p> <p>23 A. Yes.</p> <p>24 Q. And who at the U.S. Attorneys' office is</p> <p>25 responsible for certifying the caseloads?</p>	<p>21</p> <p>1 A. I do not have an institutional understanding</p> <p>2 that's related to this.</p> <p>3 Q. Are there particular code sections, to your</p> <p>4 knowledge, of the United States Code that would fall</p> <p>5 into the election fraud?</p> <p>6 A. I don't believe we specify any in the manual.</p> <p>7 I'm not sure.</p> <p>8 Q. And when you say "manual," is there a manual as</p> <p>9 to how the LIONS database operates?</p> <p>10 A. Yes.</p> <p>11 Q. And do you know if that's publicly available?</p> <p>12 A. Yes.</p> <p>13 MR. HEARD: We'll note for the record</p> <p>14 we've disclosed the location of the LIONS manual.</p> <p>15 Q. (By Ms. Wolf) Now, just taking a look at</p> <p>16 Exhibit 4, if you see "court," the heading "court"?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Are those -- the items that are below</p> <p>19 "court," are those the -- are those geographical</p> <p>20 locations? Or do they mean something else?</p> <p>21 A. They mean something else.</p> <p>22 Q. Okay. And so what does NC mean?</p> <p>23 A. NC means not in court, so that would be what</p> <p>24 you refer to as an investigation.</p> <p>25 Q. Okay.</p>

Population and Voter Data
with Voter Registration Comparison

PL1161
9/2/2014
2:13-cv-000193

CONGRESSIONAL DISTRICTS - PLANC235

District	Deviation	Population							Total Voter Registration					Non-Suspense Voter Registration		
		Total	%A	%B	%H	%BH	%O	General Election	Turnout	Total	SSVR	TO/VR	Total	SSVR	TO/VR	
1	0 0.00%	Total:	698,488	64.4	18.5	15.5	33.7	1.9	2012	255,932	391,948	4.8 %	65.3 %	344,990	4.8 %	74.2 %
		VAP:	523,448	68.2	17.7	12.3	29.9	1.9	2010	165,185	404,654	4.4 %	40.8 %	351,474	4.4 %	47.0 %
2	0 0.00%	Total:	698,488	50.8	10.5	30.8	40.7	8.5	2012	252,393	376,367	14.5 %	67.1 %	328,005	14.4 %	76.9 %
		VAP:	518,345	55.0	9.6	27.3	36.5	8.6	2010	172,006	372,078	13.5 %	46.2 %	324,509	13.4 %	53.0 %
3	0 0.00%	Total:	698,488	62.4	9.3	14.5	23.4	14.2	2012	273,369	394,887	6.2 %	69.2 %	337,273	6.0 %	81.1 %
		VAP:	500,074	65.3	8.6	12.8	21.1	13.5	2010	140,980	381,905	5.9 %	36.9 %	331,691	5.6 %	42.5 %
4	0 0.00%	Total:	698,488	73.8	11.5	12.2	23.5	2.7	2012	257,218	407,921	4.1 %	63.1 %	355,759	4.0 %	72.3 %
		VAP:	521,731	77.1	10.7	9.7	20.3	2.6	2010	162,593	414,048	3.7 %	39.3 %	360,518	3.7 %	45.1 %
5	0 0.00%	Total:	698,488	57.2	14.9	25.2	39.7	3.1	2012	214,415	350,985	8.9 %	61.1 %	305,431	9.0 %	70.2 %
		VAP:	511,695	62.3	13.9	21.0	34.7	3.0	2010	134,842	358,066	8.2 %	37.7 %	309,752	8.1 %	43.5 %
6	10 0.00%	Total:	698,498	54.3	19.3	20.8	39.4	6.2	2012	254,216	382,790	10.4 %	66.4 %	329,512	10.3 %	77.1 %
		VAP:	502,865	58.9	17.5	17.7	34.9	6.2	2010	146,090	388,461	9.6 %	37.6 %	331,138	9.6 %	44.1 %
7	0 0.00%	Total:	698,488	47.3	12.4	30.1	41.8	10.9	2012	242,421	356,491	12.6 %	68.0 %	307,321	12.3 %	78.9 %
		VAP:	519,479	50.9	11.6	27.0	38.1	11.0	2010	169,040	353,820	11.6 %	47.8 %	304,938	11.3 %	55.4 %
8	0 0.00%	Total:	698,488	68.4	8.9	19.7	28.2	3.4	2012	254,933	384,050	7.9 %	66.4 %	334,376	7.8 %	76.2 %
		VAP:	516,691	71.6	8.7	16.7	25.2	3.2	2010	171,204	376,057	7.3 %	45.5 %	326,252	7.2 %	52.5 %
9	0 0.00%	Total:	698,488	11.5	40.3	37.3	76.5	12.0	2012	188,540	316,494	15.8 %	59.6 %	268,722	16.3 %	70.2 %
		VAP:	500,927	13.9	39.6	34.0	72.7	13.4	2010	116,374	317,251	14.6 %	36.7 %	266,506	15.0 %	43.7 %
10	-1 0.00%	Total:	698,487	57.5	11.2	26.3	36.9	5.6	2012	271,537	406,426	11.5 %	66.8 %	352,701	11.4 %	77.0 %
		VAP:	513,735	61.6	10.5	22.8	32.9	5.5	2010	182,334	403,338	10.7 %	45.2 %	347,105	10.5 %	52.5 %
11	0 0.00%	Total:	698,488	61.0	4.3	33.3	37.1	1.9	2012	232,349	385,845	20.4 %	60.2 %	334,142	20.3 %	69.5 %
		VAP:	522,630	65.7	3.8	28.8	32.4	1.9	2010	155,016	395,682	19.8 %	39.2 %	343,482	19.5 %	45.1 %
12	0 0.00%	Total:	698,488	66.4	8.6	20.6	28.9	4.7	2012	250,875	371,589	10.2 %	67.5 %	314,844	10.1 %	79.7 %
		VAP:	518,938	70.6	7.8	17.2	24.8	4.6	2010	147,255	383,936	9.3 %	38.4 %	325,277	9.1 %	45.3 %
13	0 0.00%	Total:	698,488	67.0	6.1	24.1	29.8	3.2	2012	231,770	385,307	12.3 %	60.2 %	332,712	11.9 %	69.7 %
		VAP:	519,246	71.4	5.6	20.2	25.6	3.1	2010	147,531	401,955	11.8 %	36.7 %	342,791	11.5 %	43.0 %
14	-16 0.00%	Total:	698,472	53.3	21.2	22.1	42.8	3.9	2012	248,177	407,734	11.7 %	60.9 %	350,510	11.7 %	70.8 %
		VAP:	523,423	56.9	20.3	19.2	39.2	3.8	2010	164,942	412,313	11.4 %	40.0 %	351,200	11.3 %	47.0 %
15	0 0.00%	Total:	698,488	16.3	2.0	80.6	82.2	1.5	2012	152,930	290,758	67.7 %	52.6 %	248,225	67.7 %	61.6 %
		VAP:	469,736	19.4	2.1	77.2	79.0	1.6	2010	84,855	300,705	66.5 %	28.2 %	262,292	66.8 %	32.4 %
16	0 0.00%	Total:	698,488	14.7	4.1	80.1	83.4	1.9	2012	157,723	316,234	67.9 %	49.9 %	267,041	69.6 %	59.1 %
		VAP:	493,308	17.0	3.8	77.6	80.9	2.1	2010	82,266	339,856	65.7 %	24.2 %	319,178	66.2 %	25.8 %
17	-1 0.00%	Total:	698,487	57.7	14.5	23.3	37.2	5.2	2012	224,281	361,919	11.7 %	62.0 %	304,567	11.4 %	73.6 %
		VAP:	532,324	62.2	13.0	19.8	32.5	5.3	2010	152,216	369,918	11.2 %	41.1 %	307,847	11.0 %	49.4 %
18	0 0.00%	Total:	698,488	16.7	41.4	38.7	79.2	4.1	2012	200,072	339,301	17.0 %	59.0 %	285,880	17.5 %	70.0 %
		VAP:	505,750	20.2	41.4	34.5	75.3	4.5	2010	123,773	345,446	15.6 %	35.8 %	292,182	16.0 %	42.4 %
19	-1 0.00%	Total:	698,487	57.4	6.9	33.9	40.2	2.4	2012	220,349	377,221	23.8 %	58.4 %	317,800	23.7 %	69.3 %
		VAP:	522,651	62.1	6.2	29.5	35.4	2.5	2010	138,729	385,094	23.1 %	36.0 %	330,554	22.9 %	42.0 %
20	0 0.00%	Total:	698,488	23.0	5.8	68.6	73.4	3.6	2012	190,529	344,971	56.3 %	55.2 %	289,364	57.4 %	65.8 %
		VAP:	508,354	26.3	5.5	64.9	69.8	3.8	2010	106,726	355,709	55.3 %	30.0 %	296,003	55.9 %	36.1 %

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SSVR = Spanish surname voter registration

Population and Voter Data
with Voter Registration Comparison
CONGRESSIONAL DISTRICTS - PLANC235

District	Deviation	Population							Total Voter Registration				Non-Suspense Voter Registration			
		Total	%A	%B	%H	%BH	%O	General Election	Turnout	Total	SSVR	TO/VR	Total	SSVR	TO/VR	
21	0 0.00%	Total:	698,488	64.8	4.1	27.0	30.6	4.5	2012	316,357	463,498	15.6 %	68.3 %	388,488	15.1 %	81.4 %
		VAP:	553,018	68.3	3.6	23.9	27.2	4.5	2010	211,493	466,724	15.1 %	45.3 %	387,634	14.5 %	54.6 %
22	16 0.00%	Total:	698,504	45.0	13.4	24.6	37.5	17.5	2012	255,540	385,946	15.2 %	66.2 %	340,753	15.0 %	75.0 %
		VAP:	494,512	48.0	12.7	22.3	34.6	17.4	2010	162,718	366,725	14.7 %	44.4 %	320,024	14.7 %	50.8 %
23	0 0.00%	Total:	698,488	25.5	3.6	69.3	72.4	2.1	2012	198,046	367,400	55.6 %	53.9 %	322,670	56.4 %	61.4 %
		VAP:	489,508	28.9	3.6	65.8	69.0	2.1	2010	122,593	367,614	55.1 %	33.3 %	326,175	55.9 %	37.6 %
24	0 0.00%	Total:	698,488	53.4	11.0	23.4	33.9	12.6	2012	250,205	372,663	9.6 %	67.1 %	313,303	9.4 %	79.9 %
		VAP:	528,185	57.5	10.3	20.3	30.3	12.2	2010	146,111	379,416	9.0 %	38.5 %	309,304	8.6 %	47.2 %
25	-10 0.00%	Total:	698,478	70.3	8.3	17.3	25.1	4.6	2012	272,021	422,828	8.5 %	64.3 %	359,671	8.2 %	75.6 %
		VAP:	520,530	73.5	7.5	14.8	22.0	4.5	2010	178,356	427,886	8.3 %	41.7 %	358,660	7.9 %	49.7 %
26	0 0.00%	Total:	698,488	68.4	7.8	17.3	24.7	6.9	2012	265,341	394,851	7.8 %	67.2 %	340,409	7.6 %	77.9 %
		VAP:	497,267	71.4	7.2	15.0	22.0	6.6	2010	142,012	386,901	7.3 %	36.7 %	325,417	7.1 %	43.6 %
27	-1 0.00%	Total:	698,487	42.8	6.0	49.5	54.9	2.3	2012	220,494	398,624	37.6 %	55.3 %	338,740	37.5 %	65.1 %
		VAP:	516,473	47.2	5.6	45.1	50.4	2.4	2010	147,910	406,798	36.8 %	36.4 %	343,835	36.7 %	43.0 %
28	0 0.00%	Total:	698,488	17.8	5.0	76.3	80.7	1.5	2012	171,129	324,935	63.7 %	52.7 %	281,946	64.9 %	60.7 %
		VAP:	472,331	21.1	4.8	72.7	77.2	1.7	2010	96,139	329,018	62.0 %	29.2 %	288,518	63.2 %	33.3 %
29	0 0.00%	Total:	698,488	11.8	10.7	76.3	86.2	2.0	2012	117,349	239,246	55.4 %	49.0 %	209,700	56.8 %	56.0 %
		VAP:	471,352	14.8	10.7	72.7	82.9	2.3	2010	70,900	243,760	52.0 %	29.1 %	213,559	53.2 %	33.2 %
30	-1 0.00%	Total:	698,487	17.3	46.3	34.7	80.2	2.5	2012	221,963	355,416	13.3 %	62.5 %	311,344	13.7 %	71.3 %
		VAP:	496,651	21.4	46.4	30.1	75.9	2.7	2010	126,420	356,471	12.3 %	35.5 %	305,406	12.7 %	41.4 %
31	-1 0.00%	Total:	698,487	59.5	12.9	22.5	34.5	6.0	2012	245,130	387,591	12.1 %	63.2 %	322,046	11.8 %	76.1 %
		VAP:	501,657	63.6	11.6	19.5	30.6	5.8	2010	145,684	379,539	11.7 %	38.4 %	314,843	11.3 %	46.3 %
32	0 0.00%	Total:	698,488	53.3	13.0	25.6	38.1	8.6	2012	258,346	384,662	9.3 %	67.2 %	334,272	9.3 %	77.3 %
		VAP:	523,179	58.0	11.8	21.9	33.4	8.7	2010	160,318	384,526	8.8 %	41.7 %	330,594	8.7 %	48.5 %
33	0 0.00%	Total:	698,488	14.5	17.2	66.3	82.7	2.7	2012	120,963	226,660	37.0 %	53.4 %	194,684	38.8 %	62.1 %
		VAP:	469,456	18.4	17.8	61.3	78.5	3.0	2010	65,841	239,206	34.1 %	27.5 %	200,514	35.8 %	32.8 %
34	-1 0.00%	Total:	698,487	15.2	1.6	82.7	83.9	1.0	2012	150,436	324,294	73.3 %	46.4 %	284,998	74.0 %	52.8 %
		VAP:	480,232	18.6	1.7	79.0	80.4	1.1	2010	87,633	326,112	71.1 %	26.9 %	289,723	71.9 %	30.2 %
35	0 0.00%	Total:	698,488	25.2	10.8	62.8	72.5	2.4	2012	169,279	324,268	44.6 %	52.2 %	264,668	46.1 %	64.0 %
		VAP:	502,769	29.4	10.4	58.3	68.0	2.6	2010	95,564	335,961	43.8 %	28.4 %	270,804	45.0 %	35.3 %
36	0 0.00%	Total:	698,488	65.8	9.9	21.2	30.8	3.4	2012	242,592	399,926	10.0 %	60.7 %	353,605	9.8 %	68.6 %
		VAP:	517,267	69.5	9.4	18.0	27.2	3.4	2010	163,915	405,807	9.3 %	40.4 %	354,823	9.2 %	46.2 %

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PL1162
9/2/2014
2:13-cv-000193

District	2012 VR	2012 SSVR%	2012 SSVR
1	391,948	4.8%	18,814
2	376,367	14.5%	54,573
3	394,887	6.2%	24,483
4	408,921	4.1%	16,766
5	350,985	8.9%	31,238
6	382,790	10.4%	39,810
7	356,491	12.6%	44,918
8	384,050	7.9%	30,340
9	316,494	15.8%	50,006
10	406,426	11.5%	46,739
11	385,845	20.4%	78,712
12	371,589	10.2%	37,902
13	385,307	12.3%	47,393
14	407,734	11.7%	47,705
15	290,758	67.7%	196,843
16	316,234	67.9%	214,723
17	361,919	11.7%	42,345
18	339,301	17.0%	57,681
19	377,221	23.8%	89,779
20	344,971	56.3%	194,219
21	463,498	15.6%	72,306
22	385,946	15.2%	58,664
23	367,400	55.6%	204,274
24	372,663	9.6%	35,776
25	422,828	8.5%	35,940
26	394,851	7.8%	30,798
27	398,624	37.6%	149,883
28	324,935	63.7%	206,984
29	239,246	55.4%	132,542
30	355,416	13.3%	47,270
31	387,591	12.1%	46,899
32	384,662	9.3%	35,774
33	226,660	37.0%	83,864
34	324,294	73.3%	237,708
35	324,268	44.6%	144,624
36	399,926	10.0%	39,993

Total SSVR
2,928,284

Source: C235 RED-202 Report